

Christian L. Moore, Esq. (SBN 3777)
LAXALT LAW GROUP, LTD.
9790 Gateway Drive, Suite 200
Reno, Nevada 89521
(775) 322-1170
cmoore@laxaltlaw.com
Attorneys for Plaintiff
Foremost Insurance Company,
Grand Rapids, Michigan

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

FOREMOST INSURANCE COMPANY,
GRAND RAPIDS, MICHIGAN,

Plaintiff

v.

MATTHEW DINOFIA; RHODA TO
RECOVERY, LLC d/b/a JOURNEY TO
RECOVERY; MICHELLI KALTSAS;
CHARLESTON RESIDENTIAL SERVICES,
LLC d/b/a CROSSROADS OF SOUTHERN
NEVADA; CARLENA BROWN, as Statutory
Heir and as Co-Administrator to the ESTATE
of GEORGE MITCHELL, JR.; GEORGE
MITCHELL, as Statutory Heir and as Co-
Administrator to the ESTATE of GEORGE
MITCHELL, JR., and DOES 1 -10,

Defendants

Case No.: 2:25-cv-00334-CDS-MDC¹

**STIPULATION OF DISMISSAL OF
CHARLESTON RESIDENTIAL
SERVICES, LLC d/b/a CROSSROADS
OF SOUTHERN NEVADA WITH
PREJUDICE**

FOREMOST INSURANCE COMPANY, GRAND RAPIDS, MICHIGAN
("Foremost"), and CHARLESTON RESIDENTIAL SERVICES, LLC d/b/a CROSSROADS OF
SOUTHERN NEVADA ("Charleston") by and through their undersigned attorneys, hereby
stipulate and agree that this matter may be dismissed as to Charleston only with prejudice with
each party to bear its own fees and costs.

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1 Plaintiff is kindly advised that this matter is assigned to Magistrate Judge
Maximiliano D. Couvillier (MDC).

1 The parties recognize that Charleston asserts no interest in the insurance contract that is
2 the subject of the declaratory relief action filed by Foremost in this matter.

3
4 DATED this 23rd day of June, 2025.

5
6 /s/ Christian L. Moore, Esq.
7 Christian L. Moore, Esq., SBN #3777
8 LAXALT LAW GROUP, LTD.
9 9790 Gateway Drive, Suite 200
10 Reno, NV, 89521
11 (775) 322-1170
12 *Attorneys for Plaintiff*
13 *Foremost Insurance Company,*
14 *Grand Rapids, Michigan*

15
16 DATED this 23rd day of June, 2025.

17
18 /s/ Lisa J. Zastrow, Esq.
19 Lisa J. Zastrow, Esq., SBN#9727
20 GARIN LAW GROUP
21 9900 Convington Cross Drive, Suite 210
22 Las Vegas, Nevada 89144
23 (702) 382-1500
24 *Attorneys for Defendant Charleston*
25 *Residential Services, LLC d/b/a*
26 *Crossroads of Southern Nevada*

27
28 Based on the parties' stipulation, Charleston
Residential Services, LLC is dismissed with
prejudice, with each party to bear its own
costs and fees.


UNITED STATES DISTRICT JUDGE

Dated: June 24, 2025